

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

J.A. CASTRO)	
)	
Plaintiffs,)	
)	
v.)	
)	
JOHN DOE 1 (<i>a.k.a.</i> “CHETSFORD”), <i>et al.</i> ,)	
)	Case No. 4:23-mc-80198-TSH
Defendant,)	
)	
WIKIMEDIA FOUNDATION, INC.,)	
)	
Third-Party Defendant.)	

MOTION TO EXPEDITE COURT ORDER

Plaintiff J.A. Castro, *pro se*, hereby motion for an expedited court order.

Defendant John Doe 1’s last-ditch effort to undercut this case failed before the U.S. District Court for the Northern District of Texas. In Texas, Defendant John Doe 1, by and through Attorney Anne Marie Mackin of the Gober Group, a law firm with deep ties to the Republican Party and Donald John Trump, represented Defendant John Doe 1, presumably on a *pro bono* basis, and motioned for the Court to reconsider its granting a Plaintiff’s motion for leave to conduct early discovery. The U.S. District Court for the Northern District of Texas not only denied Defendant John Doe 1’s motion for reconsideration, it further granted Plaintiff leave to amend his Complaint to cure some of the perceived defects (Plaintiff maintains there were no defects but amended to strategically moot Defendant John Doe 1’s objections).

Defendant John Doe 1 continues to be represented in this case by Michael Rosman of the “Center for Individual Rights,” an alleged non-profit organization that has not filed its Non-Profit

Organization Income Tax Exempt Return since 2019. As such, Plaintiff is unable to determine if this purported organization is even qualified to continue operating as a “public charity.”

Defendant and Third-Party Defendant have exhausted all avenues to undercut this case. Third-Party Defendant Wikimedia Foundation must now be compelled to turn over the information requested in the subpoena so that Plaintiff can promptly identify Defendant John Doe 1.

Dated: November 21, 2023.

Respectfully submitted,

By: /s/ John Anthony Castro

John Anthony Castro
12 Park Place
Mansfield, TX 76063
Tel. (202) 594 – 4344
J.Castro@CastroAndCo.com
Plaintiff *Pro Se*

CERTIFICATE OF SERVICE

On November 21, 2023, I electronically filed the foregoing document via the Court’s CM/ECF system. It is further certified that all other parties are CM/ECF users and that service of this document will be made upon them via CM/ECF.

/s/ John Anthony Castro
John Anthony Castro